

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

PYROTECHNICS MANAGEMENT, INC.,)	
)	
Plaintiff,)	Civil Action No. 2:19-cv-00893
)	
v.)	
)	JURY TRIAL DEMANDED
XFX PYROTECHNICS LLC and fireTEK,)	
)	
Defendants.)	

PLAINTIFF'S PROPOSED EXHIBIT LIST

Plaintiff Pyrotechnics Management, Inc. identifies the following exhibits for the August 19, 2020 preliminary injunction hearing in this action:

1. Copyright Registration No. TX 8-738-709 (Exhibit A to Complaint).
2. Advertisements by fireTEK for new router (Exhibit B to Complaint).
3. YouTube video by Laurian Antoci demonstrating new fireTEK router (Exhibit C to Complaint).
4. March 18, 2019 cease and desist letter to XFX Pyrotechnics LLC (Exhibit D to Complaint).
5. March 18, 2019 cease and desist letter to fireTEK (Exhibit E to Complaint).
6. PGI Bulletin fireTEK advertisement (Exhibit F to Complaint).
7. Expert Report of Robert M. Capuro (PYROTECHNICS 0001-0057).
8. Robert M. Capuro curriculum vitae (PYROTECHNICS 0058-0060).
9. Email from Laurian Antoci to Daniel Barker (PYROTECHNICS 0061).
10. Notes by Daniel Barker from meeting with Laurian Antoci (PYROTECHNICS 0062).
11. fireTEK materials from XFX Pyrotechnics LLC webpage (PYROTECHNICS 0063-0138).

12. XFX Pyrotechnics LLC contact webpage (PYROTECHNICS 0139-0140).
13. fireTEK webpage showing “Official Distributors” (PYROTECHNICS 0141-0144).
14. Copyright Deposit Materials for Registration No. TX 8-738-709 (PYROTECHNICS 0145-0151).
15. XFX Pyrotechnics LLC Interrogatory Responses received September 3, 2019 (Not Bates Numbered).

Plaintiff reserves the right to supplement or amend this list up to and through the time of the hearing. Plaintiff also reserves the right to use any exhibit, whether listed here or not, for purchases of impeachment, rebuttal, or to refresh a witness’s recollection of events. Further, Plaintiff reserves the right to use any exhibit identified on the Exhibit List of any other party to this proceeding.

Respectfully submitted,

/s/ Kevin C. Harkins

/s/ Fred Tolhurst

/s/ Lucy E. Hill

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Dated: August 3, 2020

Attorneys for Plaintiff, Pyrotechnics Management, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2020 pursuant to Local Rule 5.5 of the United States District Court for the Western District of Pennsylvania, the foregoing **Plaintiff's Proposed Exhibit List** was served upon the parties of record by the Court's electronic filing system.

/s/ Kevin Harkins